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Attorneys for Defendant  
National Board of Medical Examiners

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Jason Zangara,  Plaintiff,  v.  National Board of Medical Examiners,  Defendant.	Civil Action No. 3:22-cv-01559-RK-JBD  MOTION RETURNABLE September 5, 2023
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**NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that, on September 5, 2023, or as soon thereafter as may be heard, Defendant National Board of Medical Examiners (“NBME”) shall move before the United States District Court for the District of New Jersey at the Martin Luther King, Jr. Federal Building & United States Courthouse, 50 Walnut Street, Newark, NJ 07101, for entry of an Order dismissing the Complaint in this action pursuant to Federal Rule of Civil Procedure 12(b)(2) due to Plaintiff’s failure

to show that this Court has personal jurisdiction over NBME or, alternatively, dismissing the Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6) due to Plaintiff's failure to state a claim for which relief may be granted.

NBME relies on the accompanying Memorandum of Law and Exhibit A in support of this motion.

PLEASE TAKE FURTHER NOTICE that NBME respectfully requests that the Court enter the proposed Order attached hereto.

Dated: August 10, 2023

Respectfully submitted,

**PERKINS COIE LLP**

By: /s/ Adam Mandelsberg  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Notice of Motion to Dismiss, the supporting Memorandum of Law and exhibit, and the Proposed Order were electronically filed with the United States District Court for the District of New Jersey on August 10, 2023 and were sent by first class mail, postage prepaid, to:

Jason Zangara  
573 Sidorske Avenue  
Manville, New Jersey 08835

*Pro Se Plaintiff*

/s/ Adam Mandelsberg